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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA
PHOENIX DIVISION

Jason Crews,

Plaintiff,

v.

Tanpri Media & Arts, Inc, *et al.*

Defendants.

Case No.: 2:22-cv-02120-SMB

Memorandum in Support of *Plaintiff's Ex Parte*
Application for Subpoenas Duces
Tecum for Post Judgment Discovery

Pursuant to Federal Rules of Civil Procedure ("FRCP") Rule 45 and GENERAL ORDER 18-19 ("Order"), Judgment Creditor Jason Crews ("Crews") respectfully moves the court to instruct the Clerk of the Court to issue corrected proposed subpoenas duces tecum to obtain evidence which he believes to be in the possession of third parties for the purposes of judgment enforcement against Judgment Debtors.

PayPal

Per a user search on PayPal.com it appears Judgment Debtor, Matthew Capozzoli ("Capozzoli") has an account with PayPal, Inc ("PayPal") and its subsidiary Venmo. As such, Crews, seeks the following from PayPal:

1. Please provide the Paypal and Venmo Consumer Profile and Transaction Search for the following email address "customer token" associated email addresses:

- mattcapozzoli@gmail.com

2. To the extent not duplicative of Request No. 1, please provide a list of all PayPal and Venmo transactions associated with the tokens above from December 9, 2022 to present.
3. To the extent not duplicative of Request No. 1, please provide all bank account and customer information associated with the Paypal and Venmo token account(s) identified, to include, but not limited to, the account holder name, address, SSN, and linked financial institution, bank account number, and routing number.

Zelle (Matthew Capozzoli)

Per a user search on the Zelle payment processing system Capozzoli transacts Early Warning Systems, LLC dba Zelle (“Zelle”). As such, Crews seeks the following from Zelle.

1. Please provide the Zelle Consumer Profile and Transaction Search for the following email address “customer token” associated email addresses:

- mattcapozzoli@gmail.com

2. To the extent not duplicative of Request No. 1, please provide a list of all Zelle transactions associated with the tokens above from December 9, 2022 to present.

3. To the extent not duplicative of Request No. 1, please provide all bank account and customer information associated with the Zelle token account(s) identified, to include, but not limited to, the account holder name, address, SSN, and linked financial institution, bank account number, and routing number.

Zelle (Elizabeth Beauvil)

Per a user search on the Zelle payment processing system Elizabeth Beauvil (“Beauvil”) transacts Zelle. As such, Crews seeks the following from Zelle.

1. Please provide the Zelle Consumer Profile and Transaction Search for the following email address “customer token” associated email addresses:

- lizb65@gmail.com

2. To the extent not duplicative of Request No. 1, please provide a list of all Zelle transactions associated with the tokens above from December 9, 2022 to present.

3. To the extent not duplicative of Request No. 1, please provide all bank account and customer information associated with the Zelle token account(s)

identified, to include, but not limited to, the account holder name, address, SSN, and linked financial institution, bank account number, and routing number.

Twitch Interactive, Inc.

Capozzoli is a paid content creator publishing content on Twitch.com. Because Capozzoli advertises memberships and other paid services on his Twitch.com profile page Crews requests the following.

1. Please provide the Twitch Consumer Profile and Transaction Search for the following email address “customer token” associated email addresses:

- mattcapozzoli@gmail.com
- User name UnelectableAirwaves
- <https://www.twitch.tv/unelectableairwaves/>

2. To the extent not duplicative of Request No. 1, please provide a list of all Twitch transactions associated with the tokens above from December 9, 2022 to present.

3. To the extent not duplicative of Request No. 1, please provide all bank account and customer information associated with the Twitch token account(s) identified, to include, but not limited to, the account holder name, address, SSN, and linked financial institution, bank account number, and routing number.

Warp World, Inc., dba 1UpCoin

According to <https://www.twitch.tv/unelectableairwaves/> Capozzoli utilizes Worp World, Inc., dba 1UpCoin as a payment processor for crypto currencies.

1. Please provide the 1upcoin and WarpWorld Consumer Profile and Transaction Search for the following “customer token” associated with the following:

- mattcapozzoli@gmail.com
- UnelectableAirwaves
- <https://www.twitch.tv/unelectableairwaves>
- Matthew Capozzoli
- Dogecoin wallet “D7DHusTvpNMKBoYjCuVyvpRRTxo28byH3Y”

2. To the extent not duplicative of Request No. 1, please provide a list of all 1upcoin and WarpWorld transactions associated with the tokens above from December 9, 2022 to present.

3. To the extent not duplicative of Request No. 1, please provide all bank account and customer information associated with the 1upcoin and WarpWorld token account(s) identified, to include, but not limited to, the account holder name,

address, SSN, and linked financial institution, bank account number, routing number, and wallet addresses.

Slingshot Legal Support

According to <https://slingshotlegalsupport.com/>, Capozzoli is a managing partner of Slingshot Legal Support, LLC. Slingshot Legal Support, LLC does not seem to be an entity registered in any state within the United States. As such, Crews requests the following from "Slingshot Legal Support dba Slingshot Legal Support, LLC (an unregistered entity)":

Definitions

1. "You," "your," and "yours" refer to (a) the party to whom the subpoena is addressed, (b) any motor vehicle business with which that party is or has been associated in any way (whether that business is fictitious or real, and irrespective of the form of the business), including but not limited to Matthew Capozzoli.

2. "Employee" means any person, including an independent contractor, who has performed any service for you, on your behalf, or under your name (whether on a full-time, part-time, piece-work, or other basis, and whether paid or unpaid), and shall include but not be limited to any person authorized to buy or sell motor vehicles.

General Instructions

1. You are required to produce the originals of all documents and other items which are responsive, in whole or in part, to any description set forth in this "Subpoena Schedule," regardless of where located, that are in your possession, custody, or control, or in the possession, custody or control of any of your partners, associates, employees, agents, representatives, accountants, or attorneys, along with all copies of any such document which differ from the original by virtue of any addition, deletion, alteration, notation, or inscription on any part of the document, including its back.

2. Unless otherwise indicated, "documents" includes all documents prepared, sent, dated, received, in effect, or which otherwise came into existence at any time during the subpoena period.

3. The singular form of a word shall be construed to include within its meaning the plural form of the word, and vice versa, and the use of any tense of any verb shall be considered to also include all other tenses, in a manner that gives this subpoena schedule the broadest reading.

Time Period

The time period covered by this subpoena shall be from December 9, 2022 to present.

Documents to be Produced

1. All records required to be maintained by or filed with any federal, state, or local governmental entity with respect to any employee, including, but not limited to: W-2 forms, W-4 forms, 1099 forms, payroll records, earning records, social security

- records, unemployment insurance records, worker's compensation records, immigration records, employee benefit records, and other tax and labor records.
2. Personnel file, including any records related to his application, hiring, promotion, compensation, benefits, and termination.
3. Payroll records including but not limited to any records related to compensation, hours worked, overtime, equity or other remuneration of any form.
4. All local, state and federal income tax returns.
5. All agreements, wither formal or informal between you and [the target], and any all communications pertaining to any agreement or negotiations pursuant to any agreement even if the agreement was not executed.
6. All other records required to be maintained by or filed with any federal, state, or local governmental entity in order for you to conduct business, including, but not limited to, articles of incorporation, additional licenses (such as a merchant's license or a privilege license), sales and purchase records, and insurance records not previously requested.
7. All local, state and federal income tax returns.

Slingshot Legal Support

Plaintiff has reason to believe that Beauvil either currently or recently in the past has been employed by ZeroRisk Cases, Inc. As such Crews requests the following from ZeroRisk Cases, Inc:

Definitions

1. "You," "your," and "yours" refer to (a) the party to whom the subpoena is addressed, (b) any motor vehicle business with which that party is or has been associated in any way (whether that business is fictitious or real, and irrespective of the form of the business), including but not limited to Elizabeth Beauvil aka Raquel Beauvil.

2. "Employee" means any person, including an independent contractor, who has performed any service for you, on your behalf, or under your name (whether on a full-time, part-time, piece-work, or other basis, and whether paid or unpaid), and shall include but not be limited to any person authorized to buy or sell motor vehicles.

General Instructions

1. You are required to produce the originals of all documents and other items which are responsive, in whole or in part, to any description set forth in this "Subpoena Schedule," regardless of where located, that are in your possession, custody, or control, or in the possession, custody or control of any of your partners, associates, employees, agents, representatives, accountants, or attorneys, along with all copies of any such document which differ from the original by virtue of any addition, deletion, alteration, notation, or inscription on any part of the document, including its back.

2. Unless otherwise indicated, "documents" includes all documents prepared, sent, dated, received, in effect, or which otherwise came into existence at any time during the subpoena period.

3. The singular form of a word shall be construed to include within its meaning the plural form of the word, and vice versa, and the use of any tense of any verb shall be considered to also include all other tenses, in a manner that gives this subpoena schedule the broadest reading.

Time Period

The time period covered by this subpoena shall be from December 9, 2022 to present.

Documents to be Produced

8. All records required to be maintained by or filed with any federal, state, or local governmental entity with respect to any employee, including, but not limited to: W-2 forms, W-4 forms, 1099 forms, payroll records, earning records, social security records, unemployment insurance records, worker's compensation records, immigration records, employee benefit records, and other tax and labor records.
9. Personnel file, including any records related to his application, hiring, promotion, compensation, benefits, and termination.
10. Payroll records including but not limited to any records related to compensation, hours worked, overtime, equity or other remuneration of any form.
11. All local, state and federal income tax returns.
12. All agreements, wither formal or informal between you and [the target], and any all communications pertaining to any agreement or negotiations pursuant to any agreement even if the agreement was not executed.
13. All other records required to be maintained by or filed with any federal, state, or local governmental entity in order for you to conduct business, including, but not limited to, articles of incorporation, additional licenses (such as a merchant's license or a privilege license), sales and purchase records, and insurance records not previously requested.

All local, state and federal income tax returns.

Conclusion

Plaintiff requests the Court grant this request and instruct the Clerk to issue the requested subpoenas as attached.

Dated this April 29, 2024.

/s/ Jason Crews

Jason Crews